

AMHERSTMEDIA.ORG

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

August 6, 2013

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)*

Dear Commissioners:

Amherst Media submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Amherst Media is a 501©(3) non-profit that has been servicing Amherst, Massachusetts for the past thirty-seven years. Our three PEG channels are watched by over 7,500 households.

We carry 1,490 programs on our channels of which two are closed captioned. We carry the programs “Democracy Now” and “Armed Forces” which includes closed captioning on our channel. The onscreen video programming guide of our multichannel video programming distributor (MVPD), Comcast, does not provide a label or symbol indicating that these programs have closed captions.

We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, currently Comcast on list our channels as “Local Programming” This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). Viewers cannot determine from the MVPD’s video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Jim Lescault, Executive Director

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